

Q30. Provide all press releases, Web site postings, and other forms of public information disseminated by Highstar, Hydro Star, Nuon, Nuon Inc., Utilities, or Water Service regarding the proposed merger since the execution of the Stock Purchase Agreement.

RESPONSE: Please see the press release attached as **Exhibit 30**.

WITNESS: John Stokes & Steven M. Lubertozi

Press Release

Source: American International Group, Inc.

AIG Highstar Capital Announces the Acquisition of Utilities, Inc. from Nuon
Wednesday May 18, 10:05 am ET

NEW YORK--(BUSINESS WIRE)--May 18, 2005--Hydro Star, LLC, a subsidiary of AIG Highstar Capital II, L.P. and certain of its affiliates (Highstar II), has signed a definitive agreement to acquire 100% of the stock of Utilities, Inc. from a subsidiary of n.v. Nuon (Nuon). Hydro Star and Nuon entered into a stock purchase agreement dated May 14, 2005.

Utilities, Inc. is a water and wastewater utility holding company based in Northbrook, Illinois. It has almost 300,000 customers located in 17 states, with a principal focus in the high growth areas of the Sunbelt.

Highstar II is a group of private equity funds that invest in infrastructure related assets and businesses. Highstar II is sponsored by AIG Global Investment Group (AIGGIG). AIGGIG member companies are subsidiaries of American International Group, Inc. (AIG).

Nuon is a large energy company based in the Netherlands, active in the generation, marketing, sale and distribution of electricity, gas, and heat, as well as related products and services. The divestment is in line with Nuon's strategy to concentrate its energy business in The Netherlands, Belgium and Germany.

AIGGIG Chairman and CEO Win J. Neuger stated, "We have long considered water infrastructure as an attractive investment opportunity and an excellent complement to Highstar II's existing energy infrastructure portfolio. Utilities, Inc. is a leader in this industry and we are pleased that Highstar II has the opportunity to acquire this business from Nuon."

The transaction for the purchase of Utilities, Inc. is expected to close in early 2006 and is subject to customary conditions, including the receipt of Hart Scott Rodino approval and other regulatory approvals.

AIG Global Investment Group comprises a group of international companies which provide investment advice and market asset management products and services to clients around the world. AIGGIG member companies are subsidiaries of American International Group, Inc. (AIG).

American International Group, Inc. (AIG) is the world's leading international insurance and financial services organization, with operations in approximately 130 countries and jurisdictions. AIG member companies serve commercial, institutional and individual customers through the most extensive worldwide property-casualty and life insurance networks of any insurer. In the United States, AIG companies are the largest underwriters of commercial and industrial insurance and AIG American General is a top-ranked life insurer. AIG's global businesses also include financial services, retirement services and asset management. AIG's financial services businesses include aircraft leasing, financial products, trading and market making. AIG's growing global consumer finance business is led in the United States by American General Finance. AIG also has one of the largest U.S. retirement services businesses through AIG SunAmerica and AIG VALIC, and is a leader in asset management for the individual and institutional markets, with specialized investment management capabilities in equities, fixed income, alternative investments and real estate. AIG's common stock is listed on the New York Stock Exchange, as well as the stock exchanges in London, Paris, Switzerland and Tokyo.

Q31. Provide all materials and documents regarding the stock purchase that Highstar, Hydro Star, Nuon, Nuon Inc., Utilities, or Water Service have submitted to:

a. Investment firms.

RESPONSE: None

b. Credit rating agencies.

RESPONSE: None

c. Shareholders.

RESPONSE: Hydro Star and its parent company, the Fund, are privately held entities and, therefore, no formal approval of shareholders or investors is necessary in connection with the pursuit or consummation of this transaction.

d. Employees of Utilities or Water Service.

RESPONSE: None

WITNESS: John Stokes & Steven M. Lubertozi

Q32. Identify all utility mergers and acquisitions in which Highstar or Hydro Star have been involved since 1995. For each merger or acquisition, provide the Highstar/Hydro Star's capital structure for the 3 years before and every year since the merger or acquisition.

RESPONSE: Hydro Star is a newly formed entity; therefore this request is not applicable.

WITNESS: John Stokes

Q33. Provide all studies or analyses that Highstar, Hydro Star, Nuon, Nuon Inc., or Utilities have performed or commissioned that identify any realizable synergies that will occur between 2005 and 2010 as a result of the proposed stock purchase.

RESPONSE: The transaction at issue is a stock purchase which will effectively result in the substitution of the shareholder at the grandparent company level. The purchaser does not currently own any other water or wastewater utilities and intends to retain the current management and operational staff of Utilities, Inc. and the operating subsidiaries. As such, the Applicants do not anticipate any synergies and did not perform or commission any studies or analyses to examine said synergies.

WITNESS: John Stokes & Steven M. Lubertozi

34. For each regulated water utility that Highstar or Hydro Star owns or operates, provide in table format an analysis of the number and type of consumer complaints during the period from 2000 to 2004 and how such complaints were resolved.

RESPONSE: Neither Highstar nor Hydro Star own or operate any regulated water utilities, therefore this request is not applicable to this proposed transaction.

WITNESS: John Stokes

- Q35. a. Provide all established operational excellence objectives or best practices that Highstar and Hydro Star employ.
- b. Explain how these objectives or best practices were developed.
- c. Provide a comparison of these objectives or best practices with those employed by Utilities and Water Service.

RESPONSE: Neither Highstar nor Hydro Star own or operate any regulated water utilities. Therefore, this request is not applicable to this proposed transaction.

WITNESS: John Stokes

Q36. Provide for each of Highstar's and Hydro Star's regulated utilities the report of its most recent management audit and all updates or status reports regarding the audit's findings.

RESPONSE: Neither Highstar nor Hydro Star own or operate any regulated water utilities. Therefore, this request is not applicable to this proposed transaction.

WITNESS: John Stokes

Q37. Provide all standards or codes of conduct that Highstar and Hydro Star or its affiliates use to govern their affiliate and non-affiliate transactions.

RESPONSE: No such standard of code of conduct exists, as Hydro Star is a newly formed entity.

WITNESS: John Stokes

Q38. For each jurisdiction in which Highstar and Hydro Star has regulated operations, list and briefly explain each complaint filed against Highstar or a Highstar affiliate in which an established code or standard of conduct is alleged.

RESPONSE: No complaints have been filed against Highstar or Hydro Star involving established codes or standards of conduct.

WITNESS: John Stokes

Q39. Provide all standards or codes of conduct that Highstar, Hydro Star or affiliates use to govern their affiliate and non-affiliate transactions.

RESPONSE: Please refer to the answer to question 37.

WITNESS: John Stokes

Q40. Appendix A to this data request contains a list reflecting issues that have been addressed in previous Commission decisions in merger cases. The issues have been modified to be applicable to this application. For each issue, state AIG, AIG Global, Highstar, Hydro Star, Utilities, and Water Service commitments concerning the issue. If any party objects to making a commitment on the issue, explain in detail why.

RESPONSE: NOTE: Because Hydro Star will govern and control Utilities, which controls Water Service, Hydro Star will commit to the provisions in Appendix A. Notwithstanding the foregoing, we do not feel that it is either appropriate or necessary for the Fund to make these commitments based on the Fund's limited and indirect role in the control of Water Service.

Please see **APPENDIX A** attached hereto for the specific commitments of Hydro Star, Utilities and Water Service.

APPENDIX A
Merger Commitment Issues

1. The location of Utilities' and Water Service's books and records.

RESPONSE: Currently Utilities, Inc. maintains and houses a majority of Water Service's books and records at their corporate headquarters located in Northbrook, IL. Utilities, Inc. will continue to maintain and house these records in Northbrook, IL. However, certain operational data will continue to be maintained and housed in Kentucky.

2. In future rate cases Water Service shall not seek a higher rate of return on equity than would have been sought if the merger had not occurred.

RESPONSE: Hydro Star, Utilities, Inc., and Water Service commit that in future rate cases Water Service will not seek a higher rate of return on equity than would have been sought if the stock purchase had not occurred.

3. The accounting and rate-making treatments of Water Service excess deferred income taxes will not be affected by the merger.

RESPONSE: Hydro Star, Utilities, Inc., and Water Service commit that the accounting and rate-making treatments of Water Service excess deferred income taxes will not be affected by the stock transfer.

4. Early termination costs incurred for any senior management of Nuon or Utilities will not be allocated to Water Service.

RESPONSE: Hydro Star, Utilities, Inc., and Water Service commit that early termination costs for any senior management of Nuon or Utilities will not be allocated to Water Service.

5. Highstar, Hydro Star, and Utilities commit to take an active and ongoing role in managing and operating Water Service in the interests of customers, employees, and the Commonwealth of Kentucky, and to take the lead in enhancing Water Service's relationship with the Commission, with state and local governments, and with other community interests, including, but not limited to, meetings between Hydro Star's chief executive and the Commission at least twice a year.

RESPONSE: Hydro Star, Utilities, Inc., and Water Service commit to take an active and ongoing role in managing and operating Water Service in the interests of customers, employees, and the Commonwealth of Kentucky, and to take the lead in enhancing Water Service's relationship with the Commission, with state and local governments, and with other community interests, including, but not limited to, meetings between representatives of Utilities, Inc. and the Commission at least once a year.

6. Advising the Commission at least annually on the adoption and implementation of best practices at Water Service following the completion of the merger between Hydro Star and Nuon.

RESPONSE: Hydro Star, Utilities, Inc., and Water Service commit to advising the Commission at least annually on the adoption and implementation of best practices at Water Service following the completion of the stock purchase between Hydro Star and Nuon.

7. Concerning safety violations by employees of independent contractors, Water Service shall be responsible for the acts of the employees of the independent contractors to the same extent that Water Service is responsible for the acts of its own employees.

RESPONSE: Hydro Star, Utilities, Inc., and Water Service commit that it will comply with all notice requirements governing safety violations by employees of independent contractors.

8. Commitment by Highstar or Hydro Star to notify the Commission subsequent to its board approval and as soon as practicable following any public announcement of any acquisition of a regulated or non-regulated business

representing 5 percent or more of Highstar's or Hydro Star's market capitalization.

RESPONSE: Hydro Star, Utilities, Inc., and Water Service commit that they will notify the Commission subsequent to its board approval and as soon as practicable following any public announcement of any acquisition of a regulated or non-regulated business representing 5 percent or more of Highstar's or Hydro Star's market capitalization.

9. Commitment that the customers of Water Service will experience no change in utility service due to the stock purchase.

RESPONSE: Hydro Star, Utilities, Inc., and Water Service commit that the customers of Water Service will experience no change in utility service due to the stock purchase.

10. Commitment to (a) adequately fund and maintain Water Service's transmission and distribution system; (b) comply with all Commission regulations and statutes; and (c) supply Water Service customers' service needs.

RESPONSE: Hydro Star, Utilities, Inc., and Water Service commit that they will (a) adequately fund and maintain Water Service's transmission and

distribution system; (b) comply with all Commission regulations and statutes; and (c) supply Water Service's customers' service needs.

11. When implementing best practices, Highstar, Hydro Star, Utilities, and Water Service commit to taking into full consideration the related impacts on the levels of customer service and customer satisfaction, including any negative impacts resulting from workforce reductions.

RESPONSE: Hydro Star, Utilities, Inc., and Water Service commit that when implementing best practices they will take into consideration the related impacts on the levels of customer service and customer satisfaction, including any negative impacts resulting from workforce reductions.

12. Highstar, Hydro Star, Utilities, and Water Service commit to minimize, to the extent possible, any negative impacts on levels of customer service and customer satisfaction resulting from workforce reductions.

RESPONSE: Hydro Star, Utilities, Inc., and Water Service commit that they will minimize, to the extent possible, any negative impacts on levels of customer service and customer satisfaction resulting from workforce reductions.

13. Highstar, Hydro Star, Utilities, and Water Service commit that within 60 days of the closing of any utility merger or acquisition in the United States that is exempted under KRS 278.020(5) and 278.020(6), the Applicants will file with the Commission a petition setting forth a formal analysis of any potential synergies and benefits from the merger or acquisition and a proposed methodology for allotting an appropriate share of the potential synergies and benefits to Water Service's ratepayers.

RESPONSE: Hydro Star, Utilities, Inc., and Water Service commit that within 60 days, or as soon as practicable, of the closing of any utility merger or acquisition within the United States that is exempted under KRS 278.020(5) and 278.020(6), they will file with the Commission a petition setting forth a formal analysis of any potential synergies and benefits from the merger or acquisition and a proposed methodology for allotting an appropriate share of the potential synergies and benefits to Water Service's ratepayers.

14. Highstar, Hydro Star, Utilities, and Water Service commit that Utilities will hold 100 percent of the common stock of Water Service and that Utilities will not transfer any of that stock without prior Commission approval, even if the transfer is pursuant to a corporate reorganization as defined in KRS 278.020(7)(b).

RESPONSE: Hydro Star, Utilities, Inc., and Water Service commit that Utilities will hold 100 percent of the common stock of Water Service and that Utilities will not transfer any of that stock without prior Commission approval, even if the transfer is pursuant to a corporate reorganization as defined in KRS 278.020(7)(b).